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8 *Counsel to Canyon, Citadel, Davidson Kempner, Farallon, Sculptor, and Värde, on behalf of
themselves, and certain funds and counts managed, advised, or sub-advised by them*

9

10 **UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION**

13 **In re:**

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC
COMPANY,**

17 Reorganized Debtors.

18 Affects PG&E Corporation
19 Affects Pacific Gas and Electric Company
20 Affects both Debtors

21 *All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

22

**NOTICE OF APPEAL AND
STATEMENT OF ELECTION TO HAVE
APPEAL HEARD BY DISTRICT COURT**

23 **NOTICE IS HEREBY GIVEN** that Canyon Capital Advisors LLC (“Canyon”), Citadel
24 Advisors LLC (“Citadel”), Davidson Kempner Capital Management LP (“Davidson Kempner”),
25 Farallon Capital Management, L.L.C. (“Farallon”), Sculptor Master Fund, Ltd., Sculptor
26 Enhanced Master Fund, Ltd., Sculptor Credit Opportunities Master Fund, Ltd., Sculptor GC
27

1 Opportunities Master Fund, Ltd., Sculptor SC II, LP (collectively, “Sculptor”), and Värde Partners,
2 Inc. (“Värde”), on behalf of themselves, and/or certain funds and accounts managed, advised, or
3 sub-advised by them (collectively, the “RSA Noteholders” or “Appellants”), by and through their
4 undersigned counsel, hereby appeal to the United States District Court for the Northern District of
5 California, pursuant to 28 U.S.C. § 158(a) and Rule 8003 of the Federal Rules of Bankruptcy
6 Procedure, from the *Order Disallowing Administrative Expense Claims of Canyon Capital*
7 *Advisors LLC et al.* [Bankr. Dkt. No. 9335] (the “Order”) and the related *Memorandum Decision*
8 *Disallowing Administrative Expense Claims* [Bankr. Dkt. No. 9333] (the “Memorandum”) entered
9 in the above-captioned case on October 22, 2020. A copy of the Order is attached hereto as **Exhibit**
10 **A**. A copy of the Memorandum is attached hereto as **Exhibit B**. The RSA Noteholders anticipate
11 that notices of appeal of related orders [Bankr. Dkt. Nos. 9334, 9336] and the Memorandum will
12 be filed by Elliott Management Company (“Elliott”), and by Pacific Investment Management
13 Company LLC, as investment adviser or manager for certain funds and accounts (“PIMCO”).
14

15 Pursuant to 28 U.S.C. § 158(a), the Order and Opinion are appealable as a matter of right.
16 Pursuant to 28 U.S.C. § 158(c)(1), the Appellants hereby elect to have this appeal heard by the
17 United States District Court for the Northern District of California.
18

19 The parties to the Order (or related orders) and Memorandum, other than the RSA
20 Noteholders, and the names, addresses and telephone numbers of their respective attorneys are set
21 forth below.
22

Party	Counsel
Reorganized Debtors	WEIL, GOTSHAL & MANGES LLP Stephen Karotkin (<i>Pro Hac Vice</i> admitted) Ray C. Schrock, P.C. (<i>Pro Hac Vice</i> admitted) Jessica Liou (<i>Pro Hac Vice</i> admitted) Theodore E. Tsekerides (<i>Pro Hac Vice</i> admitted) 767 Fifth Avenue

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1 Dated: November 4, 2020

/s/ *Philip D. Anker*

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